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March 13, 2014

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*REGISTERED TO PRACTICE BEFORE U.S.
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Via Electronic Comment Filing System ("ECFS")

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *WC Docket No. 09-197; WT Docket No. 10-208*
Notice of Ex Parte Meeting
Order of Wireline Competition Bureau and Wireless Telecommunications
Bureau Conditionally Designating NTUA WIRELESS, LLC as an Eligible
Telecommunications Carrier on the Navajo Nation

Dear Ms. Dortch:

On March 11, 2014, on behalf of NTUA Wireless, LLC ("NTUA Wireless"), Walter Haase, Wade McGill, Jackson Slim Brossy, Derek Dyson and Matthew R. Rudolphi participated in-person in a meeting with Geoffrey Blackwell, Irene Flannery, Rebekah Douglas (FCC Office of Native Affairs and Policy ("ONAP")) and Alexander Minard (FCC Wireline Competition Bureau, Telecommunications Access Policy Division) (collectively, "FCC Staff"). NTUA Wireless is majority-owned by the Navajo Tribal Utility Authority, an enterprise of the Navajo Nation.

During the March 11, 2014 meeting, representatives of NTUA Wireless discussed the FCC's February 18, 2014 Order granting NTUA Wireless Conditional Eligible Telecommunications Carrier status and its proposed implementation within the Navajo Nation. FCC Staff were provided copies of the attached background materials on NTUA Wireless.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter and its attachments have been filed via ECFS and sent by email to each of the FCC staff members who participated in this meeting. If you have any questions or require any additional information, please contact me.

Respectfully submitted,

/s/ Matthew R. Rudolphi
Matthew R. Rudolphi
Counsel to NTUA Wireless, LLC

cc: Geoffrey Blackwell (via email)
Irene Flannery (via email)
Rebekah Douglas (via email)
Alexander Minard (via email)



NAVAJO TRIBAL UTILITY AUTHORITY
Post Office Box 170 Fort Defiance, Arizona 86504 928-729-5721
Walter W. Haase, PE, General Manager

About the NTUA

The Navajo Tribal Utility Authority (NTUA) has continuously served the Navajo people for more than 55 years. The NTUA was established on January 22, 1959, to address the absence of utilities on the Navajo reservation, and NTUA has grown into a thriving tribally-owned enterprise delivering a portfolio of services. The Plan of Operation states that the NTUA is organized for the operation, maintenance and expansion of electric, telecommunications, natural gas, water, wastewater and photovoltaic (solar) services for the Navajo people at a low and reasonable cost. Other objectives of the NTUA are:

- To promote employment opportunities on the Navajo Nation, and
- To improve the health and welfare of the residents of the Navajo Nation

The Navajo Nation has approximately 186,500 people and covers a land area of over 27,000 square miles (larger than West Virginia), extending into 13 counties in the states of Arizona, New Mexico and Utah. While NTUA's service territory is extremely isolated and remote, it contains significant natural resources, including surface and groundwater, range lands, forests, irrigated farmlands, lakes, fish and wildlife, as well as substantial reserves of coal, oil and natural gas, as well as wind and outstanding solar resources. Often referred to as "Navajoland," the area contains world-known attractions, including Monument Valley in Utah, Canyon de Chelly in Arizona and the Chaco Canyon Cultural Center in New Mexico.

Historically, Navajo people have a traditional economy based upon farming, hunting and grazing of livestock. This practice has continued into modern times, especially among the elderly. A consequence of this practice is that Navajo people often live on large parcels of land, creating significant distances between neighboring homes. As a result, it is often cost-prohibitive to provide utility services to individual homes on much of the reservation. There are regional communities which primarily consist of housing developments built around schools, hospitals and governmental centers.

An estimated 25% of homes on the reservation are traditional Navajo dwellings called hogans. Most housing is comprised of mobile homes, modular buildings, and standard homes. It is estimated that 31% of all homes lack complete plumbing, 28% lack kitchen facilities, 38% lack water services, 32% lack electricity, 86% lack natural gas services, and 60% lack telephone services.

The Navajo people also combat the pangs of poverty that place the reservation among the lowest echelons of socio-economic indicators for any geographic region in the United States. The latest statistics indicate the Navajo Nation has an unemployment rate of approximately 52%—more than seven times the current U.S. average—and 43% of the Navajo people live below the poverty line. The average per capita income on the Navajo Nation is \$7,269, as compared to the U.S. average per capita income of \$41,560.

For additional information about the Navajo Tribal Utility Authority, please contact:

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Celebrating 50 Years of Service to the Navajo Nation in 2009



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***NTUA Wireless:
A New Wireless Communications Company
Serving the Navajo Nation***

On April 1 2011, the Navajo Tribal Utility Authority (NTUA), along with its communications partner Commnet Wireless, LLC (Commnet) created NTUA Wireless, LLC, a wholesale and retail communications company, majority-owned by the Navajo people through NTUA, to serve the Navajo people and surrounding communities. NTUA Wireless was created to serve the communications needs of residents, businesses, and government and provide much needed local technical and sales jobs. NTUA Wireless focuses on unserved and underserved areas to provide affordable voice and data services. NTUA Wireless is also a project partner of NTUA and sub-recipient to the U.S. Department of Commerce's broadband (BTOP) grant to NTUA. NTUA Wireless manages the last-mile portion of the BTOP grant and promotes majority ownership by Navajo enterprises as a model to improve the quality of life for the Navajo people through economic development.

Cost Efficiencies: NTUA Wireless is utilizing the existing facilities of NTUA, as well as the extensive broadband infrastructure recently constructed under the BTOP Navajo Nation Middle/Last Mile Project Grant. By using existing NTUA resources and partnering with Commnet, an established wireless service provider, NTUA Wireless is uniquely positioned to offer competitive wholesale and retail wireless services to underserved and un-served areas of the Navajo Nation. On February 18, 2014 NTUA Wireless received from the Federal Communications Commission designation as an Eligible Telecommunications Carrier to receive federal support and drastically reduce the customer costs to the Navajo people for NTUA Wireless' retail communication services.

Jobs and Economic Development: NTUA Wireless will provide needed technical, management, and retail jobs and will grow the communications expertise of the Navajo people. NTUA Wireless has created nearly thirty full-time employment positions and an additional seven part-time employment positions. Specifically, ten employees work within NTUA Wireless's main office in management, tech support and administrative support. An additional fourteen full-time and seven part-time employees will staff the district offices in sales roles. Local contractors were also brought on for installation work. The presence of NTUA Wireless on the Navajo Nation will also help facilitate the growth and development of other companies and industries in the Four-Corners area, which depend on modern communications services that NTUA is establishing.

Celebrating 50 Years of Service to the Navajo Nation in 2009

Customer-Centered Service: NTUA Wireless has opened six retail store services in existing NTUA offices throughout the Navajo Nation, making its customer offerings accessible to the Navajo people across the Navajo Nation. NTUA Wireless is rolling out its retail offerings through these facilities which are located in the communities of Ft. Defiance, Chinle, Shiprock, Kayenta, Tuba City, and Dilkon. Using NTUA's existing offices as retail stores allows NTUA Wireless to immediately reach the Navajo people in ways that existing communications service providers cannot match.

Service Coverage: As part of the BTOP project, thirty two new communications tower sites have been installed throughout the Navajo Nation, in addition to twenty seven existing towers (for a total of fifty nine tower sites), to deliver a 4G LTE wireless solution at forty three tower sites. Through cost efficiencies and the recent investment in the fiber and enhanced microwave network, NTUA Wireless will be able to initially provide retail service coverage to approximately 72% of the residences across the entire Navajo Nation—an expansive and remote area covering more than 27,000 square miles. NTUA Wireless has developed active build-out plans to continually reinvest and reach an increasing portion of the Navajo Nation residents over time.

NTUA Wireless Coverage Map



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***The Navajo Nation Middle/Last Mile Project:
Quality Broadband for the Navajo People***

The Navajo Tribal Utility Authority (NTUA) was notified on March 25, 2010, of its selection for funding to build an extensive, pioneering broadband project on the Navajo Nation. The application was submitted under the American Recovery and Reinvestment Act of 2009 (ARRA) Broadband Initiative to the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA). The Navajo Nation Middle/Last Mile project is being funded using a combination of grant funding from NTIA and matching funds provided by NTUA and its private project partner, NTUA Wireless, LLC.

The Navajo Nation Middle/Last Mile project is tackling the absence of telecommunication infrastructure on the Navajo Nation and addressing a critical need for telecommunications services. The Navajo Nation Middle/Last Mile project includes three major implementations:

- The installation of 550 miles of aerial fiber optic cable, and 20 miles of laterals, attached to NTUA's existing transmission and distribution poles, which was implemented in five phases;
- The upgrade and new installation of over 48 high capacity and licensed Microwave Point-to-Point links; and
- The installation of 32 new telecommunications tower sites throughout the Navajo Nation, in addition to existing towers, to deliver a 4G LTE wireless solution at 43 tower sites and support the enhanced Microwave Point-to-Point Network.
- The construction of a Level 3 Data Center in Shiprock, NM, to support the Network Operations Center for the project. This deployment builds upon the NTUA's existing OC3/DS3 TDM/IP microwave network, creating a total system backbone network providing broadband access to 15,120 square miles of the Navajo Nation's 27,000 square mile area. The project will provide fixed and mobile services to over 30,694 households and 1,000 businesses in 15 of the largest communities on the Navajo Nation. In addition, the project will provide high capacity connectivity on the combined middle-mile backbone to an additional 49 communities. This project will provide wireless broadband coverage to approximately 72% of the residences (about 130,000 people) on the Navajo Nation. The ability of the Navajo Nation to design, build and own a robust infrastructure is critical for the economic and technological future of the Navajo people.

In November of 2010, NTUA successfully obtained the necessary environmental, siting, and rights-of-way approvals to begin construction, and shortly afterward NTUA broke ground on the project. As of 2013, NTUA has completed installation of the 550 mile fiber optic backbone and construction of 32 new microwave towers. NTUA, along with its project partner NTUA Wireless, are optimizing

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NTUA WHITE PAPER

The Navajo Nation Middle/Last Mile Project: Quality Broadband for the Navajo People

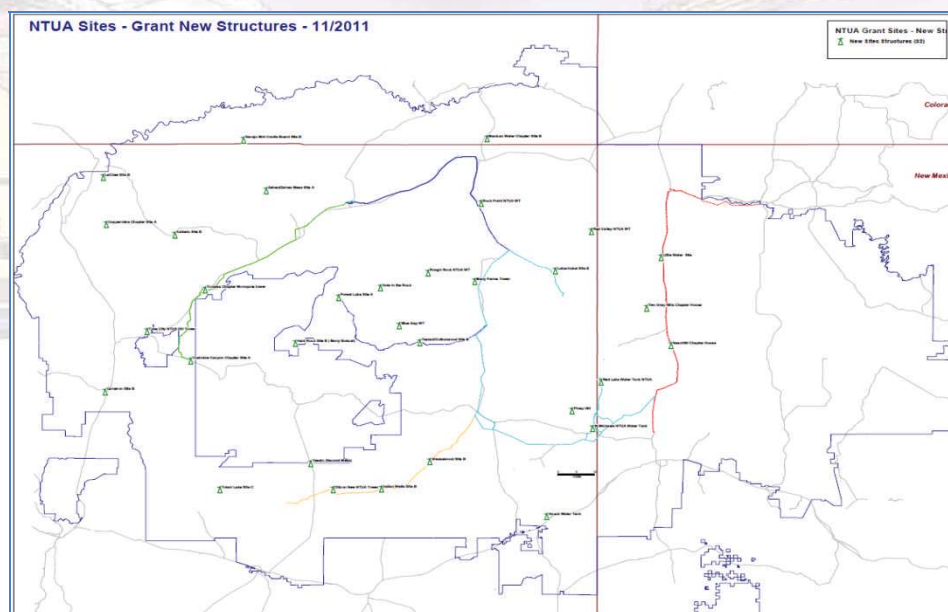
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the middle mile network and LTE coverage areas. As of December 31, 2013, NTUA has successfully completed all related installation and optimization work on this project.

Below are four areas which will drive direct, immediate and long-term benefits from the project:

1. Jobs and Economic Development: This project will directly create at least eighteen well-paying, permanent, full time jobs in management, tech support and administrative roles. NTUA conservatively estimates that more than 100 construction-related jobs have been created from the project's current activities alone. This project will be a foundation for future jobs in communications, information, and technology services on the Navajo Nation. The project currently generates revenues from tower collocation (allowing services providers to use newly created infrastructure to deliver much need telecommunications services to the Navajo Nation) and providing internet and data transport services to end customers and other telecommunications services providers;
2. Education: This project is critical to facilitate common and advanced educational opportunity for students, staff and faculty; information; public and community service program, such as distance learning; and any related virtual activities are enabled with the new infrastructure in place throughout the Navajo Nation;
3. Health: This project will provide high-speed and secure connectivity, which is critical to internal and external communication, HIPPA (privacy) management, and the delivery of telehealth and telemedicine in remote geographies of the Navajo Nation; and
4. Public Safety: This project enables public safety personnel to access necessary records, improves the ability to quickly respond to emergencies, and advances interagency communications.

PROJECT LAYOUT





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NTUA Data Center and Network Operating Center

As part of the Navajo Nation Middle/Last Mile project (NTUA Broadband Project), the Navajo Tribal Utility Authority (NTUA) has completed construction of a Data Center to house electronic equipment and software needed to operate and maintain NTUA's Broadband Data services. The Data Center is built to operate with a 24/7 Network Operations Center (NOC) to assure critical systems uptime. The Data Center houses equipment for NTUA's core utility businesses, including support services for NTUA's Smart Grid infrastructure.

The Data Center is designed to house critical data and infrastructure equipment such as computers, servers, data storage, telecommunications equipment, network equipment, and monitoring equipment. The site uses redundant power, HVAC, and networking to maintain uptime and access to critical systems. The Data Center includes high security hardware, monitoring, and strictly controlled access for physical security at the site. The Network Operations Center provides monitoring, control, and logistical support to the systems and functionality of the Data Center. The Data Center and the Network Operations Center reside at the same site and are interconnected to achieve a fully functioning support center for the NTUA Broadband Project. The Data Center represents a central hub of the critical infrastructure of NTUA's utility systems as well as a much needed disaster recovery site for both NTUA and other Navajo and local entities.

As a result of constructing the Data Center, NTUA is able to offer hosting services to other parties interested in utilizing the facility as customers of the infrastructure. NTUA is able to offer contracted support services with other Navajo Nation entities for their technical infrastructure needs. NTUA also anticipates contracting with third parties to provide IT support services. NTUA has planned the construction of the Data Center to support leasing space to Navajo entities and other third parties to maximize the use of the Data Center.

The creation of the Data Center and the Network Operations Center has created new well-paying, permanent jobs and lay the foundation for future job creation within the Navajo Nation. Specifically, NTUA has hired 14 full-time employees for the Data Center and the Network Operations Center, which include supervisors, fiber and network technicians, and administrative support. Furthermore, as other Navajo and third-party entities utilize the Data Center to support their infrastructure needs, the NTUA Data Center and the Network Operations Center will contribute to future job growth.

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